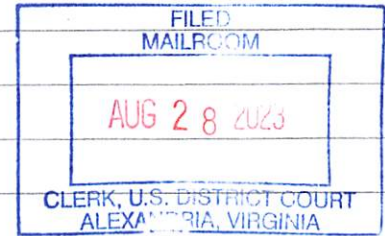


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

HENRY ERIC ROUNTON,  
PLAINTIFF,



v.

CASE No. 1:23cv0224

ARMOR CORRECTIONAL  
HEALTH SERVICES, INC.,  
et al.  
DEFENDANTS.

PLAINTIFF'S FIRST REQUEST FOR THE  
PRODUCTION OF DOCUMENTS AND THE  
PLAINTIFF'S FIRST INTERROGATORIES

PURSUANT TO RULES 33 AND 34, Fed.  
R. CIV. P., the PLAINTIFF submits  
the following INTERROGATORIES AND RE-  
QUESTS FOR documents to the  
VIRGINIA DEPARTMENT OF CORRECTIONS  
DEFENDANTS. You ARE directed to  
ANSWER EACH OF the INTERROGATORIES  
IN WRITING UNDER OATH, and to  
provide the PLAINTIFF with COPIES  
OF EACH OF the REQUESTED documents  
OR make them AVAILABLE to the  
PLAINTIFF FOR INSPECTION OR COPYING,  
within 30 days.

✓  
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# 1. STATE THE NAMES, TITLES, AND DUTIES OF ALL STAFF MEMBERS AT THE VIRGINIA DEPARTMENT OF CORRECTIONS AND AT DEERFIELD CORRECTIONAL CENTER, AT ALL TIMES RELEVANT TO THE PLAINTIFF'S CLAIMS, WHO HAVE RESPONSIBILITY FOR RESPONDING TO, INVESTIGATING OR DECIDING INMATE GRIEVANCES. IF THOSE DUTIES ARE SET FORTH IN ANY JOB DESCRIPTION, POLICY, DIRECTIVE, OR OTHER DOCUMENT, PRODUCE THE DOCUMENT(S).

# 2. STATE THE PROCEDURE IN EFFECT FOR VIRGINIA DEPARTMENT OF CORRECTIONS AND/OR DEERFIELD CORRECTIONAL CENTER DURING THE PERIOD OF 2019-2021 FOR TREATING PRISONERS THAT WERE POSITIVE FOR CHRONIC HEPATITIS C VIRUS WITH DIRECT ACTING ANTIVIRAL DRUGS. IF THIS PROCEDURE(S) ARE SET FORTH IN ANY POLICY, DIRECTIVE, OR OTHER DESCRIPTIVE DOCUMENT, PRODUCE THE DOCUMENT(S).

# 3. STATE THE DUTIES OF DEFENDANT ARMOR CORRECTIONAL HEALTH SERVICES, INC., AT ALL TIMES RELEVANT TO THE PLAINTIFF'S CLAIMS, AT DEERFIELD CORRECTIONAL CENTER. IF THE DUTIES

ARE SET FORTH IN ANY JOB DESCRIPTION, POLICY, DIRECTIVE, OR OTHER DOCUMENT, PRODUCE THE DOCUMENT(S).

# 4. STATE THE SERVICES ARMOR CORRECTIONAL HEALTH SERVICES, INC. WERE TO PERFORM AS A FOR-PROFIT INDEPENDENT CONTRACTOR UNDER CONTRACTUAL OBLIGATION WITH VIRGINIA DEPARTMENT OF CORRECTIONS AND /OR DEERFIELD CORRECTIONAL CENTER AT ALL TIMES RELEVANT TO THE PLAINTIFF'S CLAIMS. IF THOSE SERVICES/OBLIGATIONS ARE SET FORTH IN ANY CONTRACT, POLICY, DIRECTIVE, PROCEDURE, OR OTHER DOCUMENT, PRODUCE THE DOCUMENT(S).

# 5. STATE THE NAMES, TITLES, AND DUTIES OF ALL STAFF MEMBERS AT VIRGINIA DEPARTMENT OF CORRECTIONS AND /OR DEERFIELD CORRECTIONAL CENTER, AT ALL TIMES RELEVANT TO PLAINTIFF'S CLAIMS, WHO HAVE RESPONSIBILITY FOR CREATING, ENFORCING, MAINTAINING OR FOLLOWING THE PROCEDURE(S) IN EFFECT AT ALL TIMES RELEVANT TO THE PLAINTIFF'S CLAIMS, TO PROVIDE TREATMENT TO PRISONER'S THAT WERE HEPATITIS C VIRUS POSITIVE WITH DIRECT ACTING ANTIVIRAL DRUGS. IF THOSE DUTIES ARE SET FORTH IN ANY JOB DESCRIPTION, POLICY, CONTRACT, DIRECTIVE OR OTHER DOCUMENT,



produce the document(s)

# 6. STATE THE CURRENT PROCEDURE IN EFFECT AT VIRGINIA DEPARTMENT OF CORRECTIONS AND/OR DEERFIELD CORRECTIONAL CENTER FOR THE TREATMENT OF HEPATITIS C VIRUS POSITIVE PRISONERS WITH DIRECT ACTING ANTI-VIRAL DRUGS. IF THIS PROCEDURE IS SET FORTH IN ANY CONTRACT, POLICY, DIRECTIVE OR OTHER DOCUMENT, produce the document(s)

DATE: 8/22/2023

Henry Eric Roulton  
HENRY ERIC ROULTON  
5885 W. RIVER Rd  
SALEM, VA 24153

### CERTIFICATE OF SERVICE

I, hereby CERTIFY I, ON THIS 22nd day OF August, 2023 MAILED the FOREGOING DOCUMENT, TRUE AND CORRECT, VIA U. S. POSTAL SERVICE, prepaid, TO MS. MARGARET HOEL O'SHEA, SAAG, OFFICE OF THE ATTORNEY GENERAL, 202 NORTH 9th STREET, RICHMOND, VIRGINIA 23219.

Henry Eric Roulton  
5885 W. River Rd.  
SALEM VA 24153